

The Cellular Emergency Alert Systems association reply to Comments
Presented by the Cellular Telecommunication and Internet Association
In response to
FCC EB Docket Number 04-296 filed 29 November 2004

The Cellular Emergency Alert Systems association's US and International Chapter volunteers have devoted over ten years of research effort into identifying appropriate commercial and technology models that would allow authorized emergency and law enforcement agencies to utilize existing mobile telecommunications technologies and infrastructure to expand the Emergency Alert System program to include personal telecommunications devices.

While it is the mission of the association to reduce public vulnerability to the increasing frequency and severity of both natural and manmade disaster events through better communication of critical emergency instruction, it does not place the responsibility of providing such communications on private industry.

The Cellular Telecommunications and Internet Association is on record as stating the use of its members' spectrum and infrastructure for emergency alert service should be market-driven. CEASa agrees and offers the use of the Dutch carriers' cellular broadcast SMS functionality to provide a national emergency alert and advisory capability as an example of a non-mandated commercially sustainable solution.

For the CTIA to not support a voluntary participation in the EAS program because not all of its members' networks support cell-broadcast SMS, is inconsistent with its stated position.

Further, CEASa would like to correct two comments relating to cell-broadcast as stated on page 5 of its filing.

1. On September 18, 2004, the CEASassociation's Chief Technology Advisor for the US Chapter witnessed the use of a remote cell-selector platform to manage the cell-broadcast functionality in the Airadigm PCS network. This trial not only demonstrated the operability of C-B SMS in a US GSM network, but confirmed the associations long-held contention that cell-broadcast messaging could be deployed in US networks without need for modification or addition to the network's infrastructure. Any GSM, and likely CDMA network, can deploy Cell-Broadcast services by simply providing its cell-sector data and the IP address of its switch. If the 'Airadigm Model' for shared technology C-B SMS implementation were to be adopted by all US GSM networks the potential number of households reachable would be 20 those accessible by the NOAA Alert Radio program

2. Handsets from five manufactures were all able to display the cell-broadcast message without modification. The sixth handset required a new SIM card in order to display the Cell-Broadcast 'Area Information' menu needed to receive the C-B SMS message.

Respectfully Submitted,
30 November 2004
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